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6 Attorneys for Defendants  
7 BELTLINE ROAD INSURANCE AGENCY, INC.  
and ALTISOURCE PORTFOLIO SOLUTIONS S.A.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

11 MARGO PERRYMAN on behalf of herself  
and all others similarly situated,

**Plaintiff,**

V.

LITTON LOAN SERVICING, LP, et al.,

#### Defendants.

Case No. 3:14-CV-02261 JST

**JOINT STIPULATION RE RESPONSE  
BY DEFENDANT BELTLINE ROAD  
INSURANCE AGENCY, INC. AND  
SPECIALY APPEARING DEFENDANT  
ALTISOURCE PORTFOLIO SOLUTIONS  
S.A. TO PLAINTIFF'S SECOND  
AMENDED COMPLAINT**

1 Plaintiff Margo Perryman (“Plaintiff”), defendant Beltline Road Insurance Agency, Inc.  
2 (“Beltline”) and specially appearing defendant Altisource Portfolio Solutions S.A. (“Altisource”),  
3 through their respective counsel of record, stipulate as follows:

4 WHEREAS, on October 21, 2014, Plaintiff filed a First Amended Class Action Complaint,  
5 including claims against Altisource and Beltline (Dkt. No. 108);

6 WHEREAS, on February 26, 2015, Altisource filed a motion to dismiss Plaintiff’s claims  
7 against it pursuant to Rule 12(b)(2), (b)(5) and (b)(1) of the Federal Rules of Civil Procedure (Dkt.  
8 No. 176);

9 WHEREAS, on March 3, 2015, Beltline filed a motion to stay this action as to Altisource  
10 and Beltline in light of the pending settlement in *Lee v. Ocwen Loan Servicing, LLC*, No. 0:14-CV-  
11 60649 (S.D. Fla.) (“Lee”) (Dkt. No. 178);

12 WHEREAS, on March 12, 2015, the Court entered an Order (Dkt. No. 180) vacating the  
13 briefing schedule and hearing dates on Altisource’s motion to dismiss and Beltline’s motion to  
14 stay and staying this action against Beltline and Altisource pending entry of an order granting or  
15 denying final approval of the settlement in *Lee*;

16 WHEREAS, on September 14, 2015, Final Judgment was entered in *Lee*, which enjoins  
17 Plaintiff from prosecuting her claims against certain defendants in this action;

18 WHEREAS, Plaintiff filed a Notice of Appeal in *Lee*, and filed her opening appellate  
19 brief in the 11th Circuit on December 23, 2015;

20 WHEREAS, on January 15, 2016, Plaintiff filed a Second Amended Class Action  
21 Complaint, including claims against Beltline and Altisource;

22 WHEREAS, Plaintiff, Beltline and Altisource agree that, in light of the stay as to Beltline  
23 and Altisource and the pending appellate proceedings in *Lee*, no response to the Second Amended  
24 Complaint by Beltline or Altisource is required at this time;

25 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED between Plaintiff,  
26 Beltline and Altisource that:

(1) This action shall remain stayed against Beltline and Altisource pending resolution of the appellate proceedings in *Lee*;

(2) In the event the stay is lifted due to denial of final approval of the settlement in *Lee*, Beltline and Altisource shall have fourteen (14) days after the date final approval is denied to respond to Plaintiff's Second Amended Complaint pursuant to Rule 12 of the Federal Rules of Civil Procedure; and

(3) Nothing herein shall constitute a waiver of any defense of Altisource, including without limitation defenses based on lack of personal jurisdiction, lack of subject matter jurisdiction and insufficient service of process.

Dated: February 3, 2016

STROOCK & STROOCK & LAVAN LLP  
JULIA B. STRICKLAND  
BENJAMIN G. DIEHL  
DAVID W. MOON

By: /s/ David W. Moon  
David W. Moon

Attorneys for Defendants  
BELTLINE ROAD INSURANCE AGENCY, INC.  
and ALTI SOURCE PORTFOLIO SOLUTIONS S.A.

Dated: February 3, 2016

## LAW OFFICE OF SHERI L. KELLY

/s/ Sheri L. Kelly  
Sheri L. Kelly

Attorney for Plaintiff  
MARGO PERRYMAN

**FILER'S ATTESTATION**

I, David W. Moon, attest, pursuant to Civil L.R. 5-1(i)(3), that concurrence in the filing of this document has been obtained from the other signatory to this document.

Dated: February 3, 2016

STROOCK & STROOCK & LAVAN LLP  
JULIA B. STRICKLAND  
BENJAMIN G. DIEHL  
DAVID W. MOON

By: /s/ David W. Moon  
David W. Moon

Attorneys for Defendants  
BELTLINE ROAD INSURANCE AGENCY, INC.  
and ALTISOURCE PORTFOLIO SOLUTIONS S.A.

**[PROPOSED ORDER]**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: February 8, 2016

